

EPA Region VII
Request for Information
Former CertainTeed St. Louis Pipe Plant
600 St. Cyr Road, St. Louis, MO

Questions/Answers

1. Identify all persons consulted, and all documents reviewed in the preparation of responses to this Information Request.

Answer: (a) John P. McGinley, Vice President of Manufacturing, Pipe & Plastics Group, CertainTeed Corporation (hereinafter "CT"), 750 E. Swedesford Road, Valley Forge, PA 19482.

(b) CT's records pertaining to Closure Plan for Asbestos Waste Pile at its former manufacturing facility located at 600 St. Cyr Road, St. Louis, MO.

2. Identify all persons, including Respondent's employees, who have knowledge, information or documents pertaining to the generation, use, treatment, storage, disposal or other handling of hazardous substances at the Site.

Answer: John P. McGinley. (Numerous former plant employees are familiar with one or more of the issues raised in the question, but Mr. McGinley has comprehensive knowledge of all the pertinent issues.)

3. Describe the nature of your activities at the Site, particularly with respect to the processing, storage, treatment, disposal, or other handling of asbestos or asbestos-containing material ("ACM").

Answer: CT purchased this facility from Keasbey & Mattison Company (hereinafter "K&M") in June of 1962 and continued to manufacture asbestos-cement pipe until production was discontinued on May 10, 1979.

During the time the plant was operated by K&M (1938-1962) and for the first two years that CT operated the plant (1962-1964), some scrap asbestos-cement pipe was deposited at the Site (generally with the view toward providing solid fill as a base for construction activities). In 1965, CT installed a scrap pipe recycling system which permitted the scrap to be recycled into the manufacturing process. After 1965, no asbestos-cement scrap pipe was deposited at the Site.

During the time the plant was operated by K&M (1938-1962) and for the first 14 years that CT operated the

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Questions/Answers (cont'd)

plant (1962-1976), a calcium carbonate sludge was stockpiled at the Site. This sludge was a waste by-product of the asbestos-cement pipe manufacturing process. It should be noted that this sludge did not incorporate any ingredients other than those used in the manufacture of asbestos-cement pipe (asbestos, water, silica sand and cement). By 1976, CT developed a process water treatment and waste sludge recycling system that eliminated the need to discharge process waste from the manufacturing operation (refer to Exhibit #1).

4. Identify the time periods during which you operated at and/or owned the Site.

Answer: CT owned and operated this Site from June 1, 1962, until August 28, 1980, and operated the Site from June 1, 1962, until the manufacturing process was discontinued on May 10, 1979.

5. Did you acquire any portion of the Site after the disposal or placement of asbestos or ACM on the Site? Describe all of the facts on which you base the answer to this question.

Answer: This Site was previously owned and operated by K&M and it was their operating practice to deposit asbestos-cement solid waste and process waste sludge on the Site. This practice was continued by CT as described in answer No. 3. This answer is based on the personal knowledge of John McGinley.

6. Identify all solid waste units (e.g. waste piles and landfills) located at the Site during the period that you owned/operated the Site. For each unit identified, provide the following information:

- a. The type and dimensions of the unit.

Answer: Asbestos-cement solid waste material is buried throughout the Site. The asbestos-cement solid waste was used as a sub-base fill material under much of the outside concrete storage area on the Site as well as under asphalt parking lot paving. Sludge was stockpiled (see attached Exhibits #2 and #3 for dimensions).

- b. The dates that the unit was in use.

Answer: Refer to answer No. 3.

Questions/Answers (cont'd)

c. The quantity and types of materials placed in the unit.

Answer: Refer to answer No. 3. CT has no present knowledge concerning the quantity of material buried or stockpiled at the Site.

d. The construction of the unit.

Answer: All of the sludge buried at closure was covered by a minimum of 12"-18" of soil. Asbestos-cement solid waste that was used as fill material was covered by concrete slab construction or asphalt paving.

e. How the unit was closed and what actions were taken to prevent or address potential or actual releases of asbestos or ACM from the unit.

Answer: Refer to answer No. 6(d) and Exhibits #4, #5 and #6.

f. If available, provide a map showing the unit's boundaries and the location of all known solid waste units.

Answer: The location of the secured sludge material covered by the Closure Plan is shown on a drawing filed in the office of the St. Louis County Recorder of Deeds. A copy of the drawing along with the Closure Plan was provided to the present owner of this Site. Refer to Exhibits #2 and #3 for information responsive to this inquiry. Also, Exhibit #7 is an aerial photo of the CertainTeed and GAF sites taken following closure work.

7. Did you at any time while you operated at and/or owned the Site perform any investigations of the soil, water (ground or surface), geology, hydrology, or air quality on or about the Site? If so, what were the results? Provide copies of all reports, etc., pertaining to such investigations.

Answer: It is CT's belief that any such investigations were performed as part of the Closure Plan submitted to and approved by the Missouri Department of Natural Resources; however, we are presently unable to find any pertinent documents.

8. Did you at any time while you operated at and/or owned the Site perform any removal or remedial activities with regard to hazard-

Questions/Answers (cont'd)

ous substances at the Site? If so, provide copies of all documents, reports, etc., pertaining to such activities.

Answer: Refer to Exhibits #2 thru #6.

9. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of asbestos or ACM at or from the Site.

Answer: CT has no information relevant to this inquiry.

10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Answer: CT has no knowledge of persons or documents which could add to the information being supplied.

11. For every question contained herein, if information or documents responsive to this information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

Answer: Reitz & Jens, Inc., St. Louis, MO, the Consulting Engineer used to develop the Closure Plan, may have additional information or documents. Also, the Missouri Department of Natural Resources may have additional information or documents.